

**UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF MISSISSIPPI  
OXFORD DIVISION**

**DeSANTO ROLLINS**

**PLAINTIFF**

**v.**

**CIVIL ACTION NO. 3:23-cv-00356-MPM-RP**

**LANE KIFFIN, in his individual capacity and in  
his official capacity as the Head Football Coach  
for the University of Mississippi; UNIVERSITY  
OF MISSISSIPPI; and JOHN DOES 1-10**

**DEFENDANTS**

**DEFENDANTS' RESPONSE  
TO PLAINTIFF'S MOTION TO SUPPLEMENT THE RECORD**

Defendants do not oppose Plaintiff's motion to supplement the record, as the supplemental documents fully support the facts set forth in Defendant's motion. Specifically, the supplemental documents clearly show that: (1) the University and Coach Kiffin allowed Plaintiff to take a mental health break (for "as long as you want/need") from the football team beginning in February 2023 and the University arranged for Plaintiff to meet with the University's sports psychologist until Plaintiff hired a private counselor; (2) Plaintiff was not dismissed from the football team; (3) Plaintiff was invited to return to team activities when he was ready to return and released by his medical providers; (4) the University stopped communicating directly with Plaintiff to honor his request that the University communicate through his attorney; and (5) Plaintiff never sought to return to team activities, nor has he ever provided any documentation that he has been medically cleared to return to team activities. As a result, Plaintiff remained on a mental health leave the entire fall football season. Accordingly, when considering the supplemental documents, there are no genuine disputes of material fact and this Court should grant Defendants' motion and dismiss the case.

Due to the straightforward nature of this Response, Defendants respectfully request to be relieved of the requirement of a separate memorandum brief.

Respectfully submitted, this the 22d day of December 2023.

**LANE KIFFIN, in his official capacity  
as the Head Football Coach for the  
University of Mississippi, and the  
UNIVERSITY OF MISSISSIPPI**

/s/ Paul B. Watkins, Jr.

J. Cal Mayo, Jr. (MB No. 8492)  
Paul B. Watkins, Jr. (MB No. 102348)  
MAYO MALLETTE PLLC  
2094 Old Taylor Road, Suite 200  
Oxford, Mississippi 38655  
Telephone: (662) 236-0055  
Facsimile: (662) 236-0035  
[cmayo@mayomallette.com](mailto:cmayo@mayomallette.com)  
[pwatkins@mayomallette.com](mailto:pwatkins@mayomallette.com)

*Attorneys for Lane Kiffin, in his official  
capacity as the Head Football Coach for  
the University of Mississippi, and the  
University of Mississippi*

**LANE KIFFIN, in his individual capacity**

/s/ Walter G. Watkins, Jr.

Walter G. Watkins, Jr. (MB No. 6988)  
Courtney C. Hunt (MB No. 104075)  
FORMAN WATKINS & KRUTZ, LLP  
210 E. Capitol Street, Suite 2200  
Jackson, Mississippi 39201  
Telephone: (601) 960-8600  
Facsimile: (601) 960-8613  
[wg.watkins@formanwatkins.com](mailto:wg.watkins@formanwatkins.com)  
[courtney.hunt@formanwatkins.com](mailto:courtney.hunt@formanwatkins.com)

*Attorneys for Lane Kiffin, in his individual  
capacity*